

**BOARD OF TRUSTEES**

Bob Everest  
John Gospodarek  
Jason Howell  
Liz Watt  
Merrick Young



**Kevin Flanagan**  
Superintendent  
K-5 Principal  
Curriculum Director

**Brian Smith**  
6-12 Principal  
Activities Director

**School District #69**  
PO Box 460  
West Yellowstone, MT 59758  
(406) 646-7617 – Fax: (406) 646-7232  
[www.westyellowstone.k12.mt.us](http://www.westyellowstone.k12.mt.us)

Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

July 24, 2019

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before delving into my response to the proposed changes, I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and Internet access.

Our district is located in the beautiful mountain town of West Yellowstone. While it is a great place to live and visit, we are also quite isolated from other communities. However, with E-Rate funding, we have been able to bring fiber optic cable to the school, as well as increase our Internet speeds. We rely on this high-speed internet to provide distance classes that students would not otherwise be able to take, including dual credit classes, and many of our staff have taken online professional development, as it is not always time and cost effective to send staff to conferences elsewhere in the state.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted in 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each

other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

Over the last five years, E-Rate has allowed us to upgrade our entire network. We opened up a new wing two years ago, and we were able to use E-Rate funds to connect the old part of the building to the new part using fiber optic cable. This allows for everyone to have the same, consistent access. We also increased our internet speed twice over the last five years. We would not be able to afford these new speeds without E-Rate funding. I would hate to have to go down in speeds if E-Rate funding declines, or not be able to try to stay up to date with student technology. Technology is only going to continue to increase our capacity to offer courses our staff can't teach. Without E-Rate Funding, or even a decrease in the funding will force us to make tough decisions on where to allocate our scarce resources.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,



Kevin Flanagan

Superintendent